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NPC File No: 150935
NIRB File No: 25YN087

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09 March 2026

Re: Crown-Indigenous Relations and Northern Affairs Canada Information Request Response to the Kimmirut Sealift Field Program Nunavut Impact Review Board Public Comment Period (25YN087)

Dear Richard and Viren,

1 Project Overview

Worley Canada Services Ltd., operating as Worley Consulting, has been retained by the Government of Nunavut – Transportation and Infrastructure Nunavut (GN-TIN) to support the design of Sealift safety improvements in Kimmirut, Nunavut (the Project, see Appendix A (Drawing A-1)). Kimmirut is located on southern Baffin Island, on the western shore of Glasgow Bay (within Meta Incognita Peninsula), in the Qikiqtaaluk Region of Nunavut (62° 50.845'N, 69° 52.152'W, see Appendix A (Figure A-1)). Dynamic Ocean Consulting Ltd (Dynamic Ocean) is supporting Worley Consulting on the permitting requirements for the Project.

To inform the design phase, several field programs will be undertaken over the next few years, initiating in 2026 (collectively referred to as the Program).

The intention of the Program, will be as below:

- Conduct environmental, geological, geophysical, and archaeological baseline studies.
- Perform a geotechnical program to confirm seabed and quarry rock conditions.
- Topographic and bathymetric surveys.
- Existing conditions or effects studies during or post-construction of the Project.

For a detailed description of the surveys involved in each program, see Section 3.1 (Table 3-1) in the NIRB Application Letter (Dynamic Ocean, 2026).

2 Information Request Response

2.1 Background

The Program's Nunavut Impact Review Board (NIRB) application was submitted on 08 January 2026 (NIRB, 2026b) with the application accepted as complete on 20 January 2026. The screening assessment pursuant to Section 87 of the *Nunavut Planning and Project Assessment Act* was initiated. The NIRB requested interested parties to submit comments on the application over a 21-day Public Comment Period, which initiated on 22 January 2026 (NIRB, 2026a). The GN-TIN received a request from the NIRB on 19 February 2026 (NIRB, 2026c) (see list below) to respond to comment submissions (hereafter referred to as Information Requests [IRs]).

- Transport Canada (TC), 10 February 2026 (TC, 2026).
- Environment and Climate Change Canada (ECCC), 11 February 2026 (ECCC, 2026).
- Fisheries and Oceans Canada (DFO) – Fish and Fish Habitat Protection Program (FFHPP), 12 February 2026, (DFO-FFHPP, 2026).
- Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC), 13 February 2026 (CIRNAC, 2026).

2.2 Letter Intention

This letter supports the GN-TIN's response to CIRNAC's IR (see Appendix B).

The Program acknowledges that CIRNAC is the Authority Having Jurisdiction (AHJ) for pertinent legislation as below:

- Territorial Lands Act and Territorial Land Use Regulations for activities occurring below the Ordinary High-Water Mark (OHWM).

A Land Use Permit (LUP) is not required for the Program as the drilling component is not expected to fall within the thresholds of Sections 8 or 9 of the Territorial Land Use Regulations. However, it is acknowledged that CIRNAC will still have interests to confirm appropriate measures for minimization of impacts due to fuel storage (and accidental spills), waste management and reclamation. The Kimmirut Sealift Field Program's Environmental Management Plan (EMP, (Dynamic Ocean, 2025)) does address mitigation and monitoring measures for these concerns.

2.3 Response

We appreciate CIRNAC taking the time to support the NIRB during the Public Comment Period. We understand that the majority of CIRNAC's concerns are related to the fuelling, waste management and reclamation associated with the geotechnical drilling program, which is described in Section 2.1 (table 2-2) of the EMP (Dynamic Ocean, 2025). Overall, the Program is a short-duration, seasonal investigation program consisting of discrete site investigation events. The quantities of fuel and duration of the Program as presented in the NIRB application represent a maximum potential; however, as described in Table 2-1, the footprint of the geotechnical program activities is small. There are not expected to be cumulative effects of the multi-year program due to the small scale of the geotechnical program and the discreet nature of each site investigation.

A detailed response to the CIRNAC IR is provided in the Table of Concordance (Table 2-1).

Table 2-1: Crown-Indigenous Relations and Northern Affairs Canada Information Requests

ID No.	CIRNAC Information Request	CIRNAC Recommendation	Response
Fuel Storage and Refueling			
Reference • Kimmirut Sealift Field Program EMP (Dynamic Ocean, 2025). o Table 5-10: Fuel and Chemical Storage. o Section 5.3.12.1 Spill Response Protocol.			
1	The Project proposes the use of up to 10,000 L of diesel, 200 L of gasoline, and approximately 944 L of lubricants, hydraulic oils, methanol, antifreeze, and related drilling fluids to support seasonal field operations between 2026 and 2031. Fuel storage is to occur at least 31 m above the high-water mark; however, refuelling activities are anticipated to occur nearshore and in proximity to intertidal areas. In Arctic, even moderate releases can migrate rapidly across saturated or thaw-softened ground into intertidal areas. Furthermore, while secondary containment and spill response measures are described, the materials do not demonstrate that containment systems and response capacity are proportionate to the maximum single-container volume (10,000 L diesel), nor do they specify boom lengths, sorbent capacity, or equipment inventories to confirm that "worst-case" spill planning is scaled to this volume. As a result, the distinction between storage protection and transfer-related risk remains insufficiently articulated, particularly regarding spill pathways under thaw-sensitive conditions.	CIRNAC recommends that the Proponent consider: • Demonstrating that secondary containment and spill response capacity are scaled to the largest credible single-container release. • Clarifying procedures and controls for nearshore refueling to prevent migration into intertidal environments. • Describing how fuel handling practices account for thaw-sensitive ground conditions and seasonal runoff pathways.	The Program is a short-duration, seasonal investigation program consisting of discrete survey campaigns ranging from approximately one to 15 days in length. The Program does not involve establishment of a permanent camp, bulk fuel farm, or long-term fuel storage facility. Fuel volumes as referenced by CIRNAC and as documented in the NIRB Portal represent the maximum cumulative quantities that may be required across multiple seasonal field programs between 2026 and 2031; however, fuel will be stored temporarily and only in quantities required to support active operations during each specific field session. No bulk fuel transfer to marine vessels offshore or long-term shoreline fuel storage is proposed. **Secondary Containment and Spill Response Capacity** As summarised in section 5.3.10 (Table 5-10: Fuel and Chemical Storage) of the EMP (Dynamic Ocean, 2025), secondary containment, drip trays, and fuel line check valves will be installed and maintained for all fuelling activities and storage areas. These measures will be inspected regularly to identify and address any leaks, poor conditions, or improper seals. Storage and refuelling procedures will be designed and scaled according to the specific chemicals and volumes to be used. Secondary containment will be provided for all bulk fuel storage and will be designed to meet or exceed 110 % of the volume of the largest single container. For the maximum 300 L diesel container per site investigation, secondary containment capacity will therefore be no less than 330 L. Containment structures will be inspected regularly to confirm integrity. In addition, Section 5.3.12.1 of the EMP (Dynamic Ocean, 2025) outlines the implementation of a Spill and Emergency Response Plan (SERP). This plan will be activated immediately in the event of any spill, ensuring that all released material is promptly contained and managed in accordance with the established procedures. Spill response equipment will be maintained onsite during all fuel storage and transfer operations and will be scaled to the largest credible single-container release. Throughout the Program, the Worley Consulting Field Supervisor from each of the respective field programs will be available who is dedicated to documenting environmental conditions, including signs of leaks or spills.

ID No.	CIRNAC Information Request	CIRNAC Recommendation	Response
			Procedures and Controls for Nearshore Refuelling Appropriate refuelling and spill response measures from the EMP are summarized in the section above. To reiterate measures that will be followed, as outlined in the EMP, see below: • Refuelling will occur only under suitable weather conditions and not during heavy rainfall or rapid snowmelt events. • Transfer operations will be attended at all times by a designated trained fuel handler. • Drip trays and portable secondary containment berms will be positioned beneath hose connections and transfer points. • Automatic shut-off nozzles and check valves will be used during fuel transfer. • Fuel hoses and fittings will be inspected prior to each transfer event. • Refuelling will not occur directly within intertidal areas. Spill kits and absorbent booms will be staged immediately adjacent to refuelling activities prior to initiation. In the event of a release, fuel transfer will cease immediately, and containment measures will be deployed before migration can occur. These procedures reflect the temporary and mobile nature of the Program and are designed to manage transfer-related risk in proximity to nearshore environments. **Fuel Handling Practices in Thaw-Sensitive and Runoff Conditions** Fuel storage locations will be selected on stable, well-drained ground above the high-water mark and away from visible drainage pathways. Prior to staging fuel, a visual assessment will be conducted to identify low-lying areas, saturated soils, or natural runoff channels. Fuel handling practices will account for thaw-sensitive conditions by: • Avoiding placement of fuel storage in depressions or poorly drained areas. • Maintaining storage areas free of accumulated snow to reduce uncontrolled meltwater. • Installing temporary berms or diversion measures, where necessary, to prevent snowmelt or rainfall from transporting contaminants downslope. • Conducting increased visual inspections during thaw periods or rainfall events. • Berms will be available to contain or divert any snow or ice melt from the affected area in the event of a spill. In the unlikely event of a spill, response actions will consider slope, soil saturation, and seasonal runoff direction to ensure containment occurs upslope of potential drainage pathways and prior to migration toward intertidal areas.

<table>
<tr><th>ID No.</th><th>CIRNAC Information Request</th><th>CIRNAC Recommendation</th><th>Response</th></tr>
<tr><td></td><td></td><td></td><td>Given the short duration of field program and the temporary nature of fuel staging, these measures are considered proportionate to the scale and duration of the Program.</td></tr>
<tr><td colspan="4">Drill Cuttings and Deposition</td></tr>
<tr><td colspan="4">Reference
• Kimmirut Sealift Field Program EMP (Dynamic Ocean, 2025).
o Table 5-11: Waste Management.</td></tr>
<tr><td>2</td><td>The Project includes geotechnical drilling within nearshore and terrestrial study areas, with drill cuttings proposed to be discharged or placed within the drilling footprint. Drilling across multiple locations and seasons may result in repeated localized deposition of cuttings, which in tundra and coastal settings can be mobilized by rainfall or snowmelt where surface disturbance occurs. Cuttings derived from mineralized formations are not inherently inert and may contain elevated metals or exhibit acid-rock-drainage/metal-leaching (ARD/ML) potential depending on lithology.

The Proponent did not quantify anticipated cuttings volumes or describe how geochemical characteristics (including ARD/ML risk) will inform placement decisions; sediment quality testing described in the materials applies only to marine/intertidal sediments and not to drill cuttings. As such, the assumption that cuttings will remain stable within the footprint is not fully demonstrated, particularly under multi-season disturbance.</td><td>CIRNAC recommends that the Proponent consider:
• Quantifying anticipated drill cuttings volumes per borehole and cumulatively across field seasons.
• Clarifying how placement locations are selected to prevent runoff-driven migration.
• Demonstrating that material characteristics are evaluated where mineralized or potentially reactive formations are encountered, including screening for ARD/ML potential.</td><td>The Program is limited to subsurface investigation to inform detailed design. Drilling will occur during discrete short-duration site investigation and is not exploratory mineral drilling or production-related activity.
Drill cuttings generated during the Program will consist primarily of unconsolidated overburden materials and competent bedrock fragments associated with geotechnical borehole advancement. No blasting or bulk excavation is proposed. Drill cuttings will be managed onsite in a manner proportionate to the scale and temporary nature of the Program.

The following addresses the three primary concerns regarding volume quantification, placement controls, and evaluation of material characteristics.

Quantifying Anticipated Drill Volume

The expectations on marine and terrestrial drilling are as below:
<table><tr><th>Description</th><th>Marine</th><th>Terrestrial</th></tr><tr><td>Approximate Diameter</td><td>100 mm</td><td>100 mm</td></tr><tr><td>Maximum Depth</td><td>10 m</td><td>15 m</td></tr><tr><td>Approximate Volume per Borehole</td><td>0.08 m^3</td><td>0.12 m^3</td></tr><tr><td>Number of boreholes</td><td>4</td><td>4</td></tr><tr><td>Total Volume</td><td>0.32 m^3</td><td>0.48 m^3</td></tr></table>
Placement Selection to Prevent Runoff-Driven Migration

Drill cuttings will be managed at or near the borehole location and placed in a manner that prevents migration via runoff or snowmelt.

Placement locations will be selected based on:
• Stable, level ground conditions.
• Avoidance of low-lying or poorly drained areas.
• Setback from visible drainage pathways.
• Setback from waterbodies and intertidal areas.</td></tr>
</table>

ID No.	CIRNAC Information Request	CIRNAC Recommendation	Response
			Where overburden materials are encountered, drill cuttings will be: • Spread thinly and contoured to match existing grade. • Backfilled into boreholes or adjacent test pits where feasible. In areas with slope, cuttings will be placed upslope of any drainage pathway and stabilized as required to prevent mobilization. Given the limited volumes generated per borehole, and the temporary duration of field program, the risk of runoff-driven migration is considered low and will be mitigated through site-specific placement controls. **Material Characteristics** Concerns for ARD and ML will be mitigated by placing bedrock samples collected during the drilling process into securely stored wooden core boxes. These boxes will be sent to laboratories for subsequent testing.
Quarry Material Suitability and Drainage Stability			
Reference • Kimmirut Sealift Field Program EMP (Dynamic Ocean, 2025). o Table 5-3: Sediment and Water Quality.			
3	The Project includes confirmation of quarry rock conditions to support future sealift infrastructure development. Test pits and drilling will be conducted at up to four quarry sites using heavy equipment (30-40 ton excavator and mounted drill rig) to extract and sample rock for “strength and durability testing”. In Arctic environments, such investigations can disturb overburden and alter surface drainage patterns, particularly in thaw-sensitive terrain. Long-term material suitability must consider freeze-thaw durability, mechanical stability, and geochemical characteristics under prolonged moisture exposure; however, while laboratory testing is referenced, the Proponent does not specify the engineering or geochemical parameters to be used (e.g., freeze–thaw loss, leachability). Likewise, no quarry-specific drainage or erosion controls are described, despite multi-season ground disturbance at four quarry sites between 2026 and 2031. Without defined acceptance criteria and surface water management measures, uncertainty remains regarding	CIRNAC recommends that the Proponent consider: • Clarifying the engineering and geochemical parameters used to determine quarry material suitability. • Demonstrating that extracted materials will remain stable under freeze–thaw and moisture exposure conditions. • Describing erosion and surface drainage control measures associated with quarry investigations.	The Program activities at the identified quarry locations are limited to geotechnical confirmation to inform future design. The Program does not involve quarry development, material extraction for construction, blasting, or stockpiling of aggregate. Investigations consist of limited test pits and boreholes to characterize subsurface conditions and obtain representative samples for laboratory analysis. Test pits will be limited to the sealift location and will not be undertaken at potential quarry locations. Ground disturbance will be temporary and localized. Test pits will be backfilled the same day and boreholes will be properly sealed following completion, consistent with the mitigation and reclamation measures described in Section 5.3.13 of the EMP (Dynamic Ocean, 2025). The following sections clarify engineering parameters, material stability considerations, and surface water management measures applicable to the investigation phase. **Engineering and Geochemical Parameters for Quarry Material Suitability** Material suitability assessments are intended to determine whether bedrock at the investigated locations has the potential to meet future engineering requirements for fill or armour stone. Representative samples obtained during test pitting and drilling will be evaluated using standard geotechnical laboratory methods, which may include: • Unconfined compressive strength (UCS). • Point load strength index testing. • Visual assessment of rock fabric, weathering, and structural defects.

ID No.	CIRNAC Information Request	CIRNAC Recommendation	Response
	long-term material stability and sediment transport risk during rainfall or snowmelt.		• Assessment of fracture frequency and joint spacing. • Rock durability testing (Rip Rap Test Suite [specific gravity, absorption and durability index], Soundness of Aggregates, Los Angeles [LA] Abrasion, Petrological Analysis). • ARD/ML Geochemical Testing (Acid Base Accounting [ABA]), Sulphur [S] Speciation and X-Ray Diffraction). Where appropriate, geochemical screening may be conducted to assess ARD and ML potential. Should additional lithological variability or visible sulphide mineralization be encountered during investigation, additional screening would be undertaken to confirm geochemical characteristics prior to any future material use. These parameters are appropriate for investigation-stage confirmation and do not constitute final construction material acceptance criteria, which would be established at the detailed design stage if quarry development proceeds. **Stability Under Freeze Thaw and Moisture Exposure** The Program Team recognizes that in Arctic environments, long-term performance of rock materials must consider freeze–thaw cycling and moisture exposure. Material characterization will consider: • Degree of weathering and alteration. • Presence of weak planes or fracture networks. • Rock competence under saturated conditions. • Durability indicators relevant to freeze–thaw resistance. Given that current activities are limited to small-scale sampling and not bulk extraction, exposed bedrock faces will be minimal and temporary. Test pits will be backfilled and boreholes sealed upon completion minimizing exposure of freshly fractured surfaces. Should quarry development proceed in the future, detailed freeze–thaw durability testing and long-term stability assessments would be incorporated into design and permitting processes. At the investigation stage, the limited footprint and immediate reclamation measures substantially reduce the risk of moisture-driven instability. **Erosion and Surface Drainage Control During Investigations** Although disturbance at each quarry site will be limited and temporary, surface water management principles will be applied during the Program. Investigation activities will: • Avoid low-lying or poorly drained areas where feasible. • Minimize stripping of overburden. • Limit disturbance to the smallest practicable footprint. • Backfill test pits the same day to restore pre-existing grade and drainage patterns. • Plug and cap boreholes following completion.

ID No.	CIRNAC Information Request	CIRNAC Recommendation	Response
			As summarised in section 5.3.3 (Table 5-3: Sediment and Water Quality) of the EMP (Dynamic Ocean, 2025), the Environmental Monitor (EM) or marine Observer will confirm that activities performed during the Program will adhere to the Water Quality Guide (WQG). Run-off will be visually monitored, and appropriate measured will be applied to minimized or prevent sediment from entering watercourses. Where localized ponding or channeling is observed, minor grading or temporary diversion measures (e.g., small berms) will be implemented to prevent erosion or sediment transport during rainfall or snowmelt events. Given the limited scale and immediate backfilling of test pits, no long-term drainage alterations are anticipated.
Reclamation **Reference** • Kimmirut Sealift Field Program EMP (Dynamic Ocean, 2025). o Section 4.8: Terrestrial and Wildlife Disturbance. o Table 5-13: Reclamation Requirements.			
4	The field program is proposed from 2026 to 2031 and includes repeated seasonal disturbance within terrestrial, intertidal, and nearshore study areas. While drill holes will be plugged and areas cleaned following completion of activities, the EMP states that "reclamation is not required" and provides no objective restoration criteria or post-activity verification measures. In Arctic terrestrial environments, vegetation recovery is slow due to short growing seasons and freeze-thaw cycling. Disturbances to tundra surfaces or temporary laydown areas can persist for multiple years without active restoration. The conclusion that reclamation is not required does not clearly reflect a cumulative multi-season disturbance assessment and does not define measurable criteria for restoration success or seasonal verification.	CIRNAC recommends that the Proponent consider: • Clarifying how terrestrial disturbance over multiple seasons will be minimized and progressively restored. • Defining objective criteria for determining when disturbed areas are considered restored. • Describing whether post-activity verification will be undertaken to confirm ground stability and vegetation recovery.	The Program will occur during discrete seasonal mobilizations between 2026 and 2031. Activities are short-duration and localized, and do not involve establishment of permanent infrastructure, laydown yards, access roads, or quarry development. Ground disturbance associated with test pits and boreholes is temporary. As described in Section 5.2.13 the EMP, test pits will be backfilled the same day and drill holes will be plugged and capped upon completion. All equipment and waste materials will be removed from site following each site investigation. The following sections clarify how disturbance will be minimized, how restoration will be assessed, and what post-activity verification measures will be undertaken. **Minimizing and Progressively Restoring Terrestrial Disturbance** As mentioned in Section 4.8 of the EMP (Dynamic Ocean, 2025), there will be minimal impact to terrestrial habitats from the Program, since the Program will be undertaken in a well-trafficked, disturbed area. The footprint of the Program is also relatively small compared to the larger scope of the future sealift construction. Disturbance will be minimized through: • Limiting equipment travel to defined work areas. • Using existing disturbed or well-trafficked areas where feasible. • Restricting disturbance footprint to the smallest practicable area necessary for safe equipment operation. • Avoiding unnecessary stripping of vegetation or overburden. Test pits will be:

ID No.	CIRNAC Information Request	CIRNAC Recommendation	Response
			• Excavated to the minimum depth required for investigation. • Backfilled the same day using native material. • Bucket-compacted to approximate original grade Boreholes will be: • Backfilled with cuttings where appropriate. • Plugged and capped to prevent surface subsidence Restoration will occur progressively during each mobilization, rather than being deferred to the end of the multi-year Program. This approach prevents accumulation of unresolved disturbance across seasons. Given the short duration (approximately 1–15 days per campaign) and localized footprint, cumulative disturbance is expected to be limited and discontinuous across seasons. **Objective Criteria for Determining When Areas Are Restored** Please see Section 5.3.13 (Table 5-13 (Reclamation Requirements)) of the EMP (Dynamic Ocean, 2025). Drill and test pit footprint will be returned to the same condition they were in prior to the respective activities. Drill holes will be properly filled and capped, and all equipment and waste will be removed from the area. For the purposes of the Program, a disturbed area will be considered restored when the following criteria are met: • **Ground Surface Stability.** o Backfilled areas are level with surrounding grade. o No visible subsidence, voids, or unstable sidewalls remain. o Surface is compacted sufficiently to prevent erosion under normal rainfall conditions. • **Drainage Integrity.** o Pre-existing surface drainage patterns are re-established. o No unintended channeling or ponding is created by investigation activities. • **Material Management.** o All excess materials, equipment, and waste have been removed. o No stockpiles remain onsite. • **Vegetation and Surface Condition.** o Disturbed tundra surfaces are returned to original contour using native materials. o Organic overburden (if removed) is replaced where practicable. Given the investigation-scale disturbance and the previously disturbed nature of portions of the Study Area, natural revegetation is anticipated to occur without active seeding or engineered restoration measures. These criteria are appropriate to the scope and duration of the Program and reflect restoration to pre-activity condition rather than enhancement.

ID No.	CIRNAC Information Request	CIRNAC Recommendation	Response
			Post-Activity Verification of Ground Stability and Vegetation Recovery Post-activity verification will be undertaken during demobilization of each site investigation. The Environmental representative will: • Conduct visual inspection of all drill and test pit locations. • Confirm that backfilling and plugging have been completed. • Confirm that no erosion, unstable ground, or sediment transport pathways are evident. • Document site condition through field notes and photographs. If instability, erosion, or drainage alteration is observed, corrective grading or stabilization will be implemented prior to demobilization. Given the variables below, multi-year vegetation monitoring is not considered necessary. However, if subsequent mobilizations occur in proximity to prior disturbance areas, previous locations will be visually reassessed to confirm stability before new activities proceed. • The small footprint of each investigation site. • The short duration of disturbance. • Immediate backfilling and restoration measure.
Consultation with Interested Parties			
Reference • Kimmirut Sealift Field Program EMP (Dynamic Ocean, 2025). o Table 5-7: Local Support and Harvesting. o Table 5-9: Communication.			
5	-	CIRNAC recommends that the Proponent consult with Nunavut Tunngavik Inc. (NTI) and the Qikiqtani Inuit Association (QIA) on project activities. Both organizations represent Inuit interests in the project area. As part of these consultation activities, several issues should be considered, including but not limited to: • Incorporation of Inuit Qaujimajatuqangit (IQ) into project activities. • Mitigation measures designed to prevent any disturbance to wildlife and the environment. • Mitigation measures designed to prevent disturbance to sites with cultural, archaeological, and/or environmental significance.	Acknowledged. The GN-TIN remains committed to continued engagement and collaboration with NTI, the QIA, the Kimmirut Hunters and Trappers Association (HTA), and the Hamlet of Kimmirut throughout the life of the Program For the proposed field program, GN-TIN will: • Provide advance notice of seasonal mobilizations and updates on planned activities. • Share information regarding fuel management practices, quarry investigation activities, and terrestrial mitigation measures. • Incorporate IQ into field planning and environmental protection measures. • Maximize opportunities for local Inuit training, employment, and procurement. • Provide periodic updates on program status and findings.

ID No.	CIRNAC Information Request	CIRNAC Recommendation	Response
		• Training and employment opportunities for Inuit and community members. • Procurement opportunities for local and Inuit-owned businesses. • Regular updates on the status of project activities.	Given the short duration and localized footprint of the investigation program, engagement activities will be proportionate to the scale of the work and coordinated through established GN-TIN community engagement processes.

3 Summary and Closing

We appreciate CIRNAC taking the time to participate in the NIRB's Public Comment Period and are available for further discussions if needed. If you require any clarification on our responses, or have further questions, please do not hesitate to contact Laura Borden (see Table 3-1).

Table 3-1: Contact Information

Information	Details
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Geoscience Specialist: Worley Consulting Ltd.	
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Telephone / Fax	1-604-779-1884
Email	Jeffrey.Gibson@worley.com

Cc:

- Muhammad Arslan, muhammad.arslan@rcaanc-cirnac.gc.ca
- David Abernathy, david.abernathy@rcaanc-cirnac.gc.ca

4 References

CIRNAC. (2026). Re: Notice of Screening and Comment Request for Department of Transportation and Infrastructure Nunavut's "Kimmirut Sealift Field Program" Project Proposal. 13 February 2026.

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Appendix A: Supporting Figures & Drawings

Dynamic Ocean Consulting Ltd.

Nunavut

Dynamic Ocean Consulting

worley consulting

Legend

- Kimmirut Sealift
- Project Footprint

0 45 90 180 km

1: 8,650,000

N

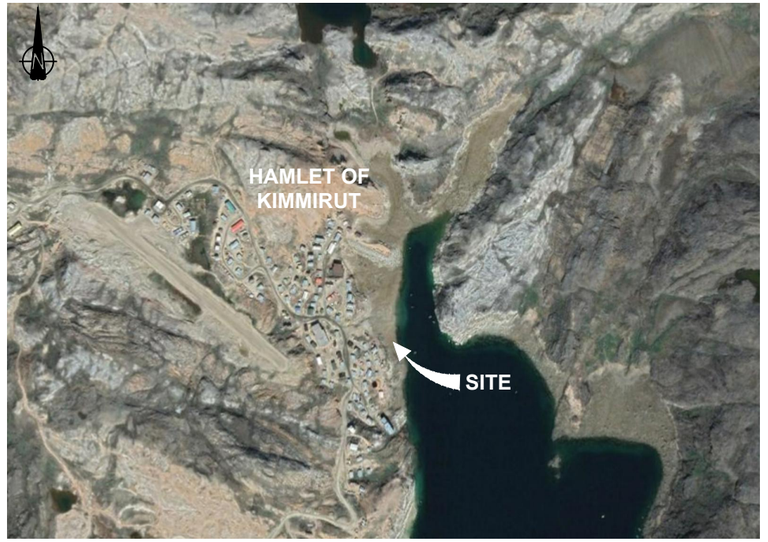
Spatial Reference
GCS: GCS North American 1983
Datum: North American 1983
Projection: Transverse Mercator
Map Units: Metre

Drawn: AW
Edited: CL
Approved: VBC

Kimmirut Sealift Project

Figure A-1

Project Location



KEY PLAN

1:15000

LEGEND:

- POWER / LIGHT POLE
- FENCE
- GATE

PLAN

1:1500

m 0 10 20 30 40 50 100 m

1:1500

GOVERNMENT OF NUNAVUT
HAMLET OF KIMMIRUT

OCEANS PROTECTION PLAN SUBMISSION Drawing A-1
GENERAL ARRANGEMENT - SEALIFT EXPANSION

Date:	Drawn by:	Edited by:	App'd by:
25-JAN-23	CH	JLC	HGK

WorleyParsons Project No.
317071-00019

DRG No
11-MA-DSK-0001

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PLOT DATE & TIME: 25/1/2023 11:51:24 AM
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Appendix B: Information Request

Dynamic Ocean Consulting Ltd.

Crown-Indigenous Relations and Northern Affairs Canada
Relations Couronne-Autochtones et Affaires du Nord Canada

CIRNAC Comments to NIRB

Re: Notice of Screening for Department of Transportation and Infrastructure Nunavut's "Kimmirut Sealift Field Program" Project Proposal

Canada

Nunavut Regional Office
918 Sivumugiaq Street
Iqaluit, NU, X0A 3H0

Your file - Votre référence
25YN087
Our file - Notre référence
GCdocs# 143589796

February 13, 2026

Viren Nasit
Senior Impact Assessment Officer
Nunavut Impact Review Board
P.O. Box 1360
Cambridge Bay, NU, X0B 0C0
via NIRB public registry

Re: Notice of Screening and Comment Request for Department of Transportation and Infrastructure Nunavut's "Kimmirut Sealift Field Program" Project Proposal

Dear Viren Nasit,

On January 22, 2026, the Nunavut Impact Review Board (NIRB) invited parties to comment on Department of Transportation and Infrastructure Nunavut's "Kimmirut Sealift Field Program" project proposal. Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) appreciates the opportunity to provide comments and offers the responses below as it pertains to the NIRB's request:

Any matter of importance to the Party related to the project proposal

CIRNAC #1: Fuel Storage and Refueling

The Project proposes the use of up to 10,000 L of diesel, 200 L of gasoline, and approximately 944 L of lubricants, hydraulic oils, methanol, antifreeze, and related drilling fluids to support seasonal field operations between 2026 and 2031. Fuel storage is to occur at least 31 m above the high-water mark; however, refuelling activities are anticipated to occur nearshore and in proximity to intertidal areas. In Arctic, even moderate releases can migrate rapidly across saturated or thaw-softened ground into intertidal areas. Furthermore, while secondary containment and spill response measures are described, the materials do not demonstrate that containment systems and response capacity are proportionate to the maximum single-container volume (10,000 L diesel), nor do they specify boom lengths, sorbent capacity, or equipment inventories to confirm that "worst-case" spill planning is scaled to this volume. As a result, the distinction between storage protection and transfer-related risk remains insufficiently articulated, particularly regarding spill pathways under thaw-sensitive conditions. CIRNAC recommends that the Proponent consider:

- Demonstrating that secondary containment and spill response capacity are scaled to the largest credible single-container release;

- Clarifying procedures and controls for nearshore refueling to prevent migration into intertidal environments; and
- Describing how fuel handling practices account for thaw-sensitive ground conditions and seasonal runoff pathways.

CIRNAC #2: Drill Cuttings and Deposition

The Project includes geotechnical drilling within nearshore and terrestrial study areas, with drill cuttings proposed to be discharged or placed within the drilling footprint. Drilling across multiple locations and seasons may result in repeated localized deposition of cuttings, which in tundra and coastal settings can be mobilized by rainfall or snowmelt where surface disturbance occurs. Cuttings derived from mineralized formations are not inherently inert and may contain elevated metals or exhibit acid-rock-drainage/metal-leaching (ARD/ML) potential depending on lithology.

The Proponent did not quantify anticipated cuttings volumes or describe how geochemical characteristics (including ARD/ML risk) will inform placement decisions; sediment quality testing described in the materials applies only to marine/intertidal sediments and not to drill cuttings. As such, the assumption that cuttings will remain stable within the footprint is not fully demonstrated, particularly under multi-season disturbance. CIRNAC recommends that the Proponent consider:

- Quantifying anticipated drill cuttings volumes per borehole and cumulatively across field seasons;
- Clarifying how placement locations are selected to prevent runoff-driven migration; and
- Demonstrating that material characteristics are evaluated where mineralized or potentially reactive formations are encountered, including screening for ARD/ML potential.

CIRNAC #3: Quarry Material Suitability and Drainage Stability

The Project includes confirmation of quarry rock conditions to support future sealift infrastructure development. Test pits and drilling will be conducted at up to four quarry sites using heavy equipment (30-40 ton excavator and mounted drill rig) to extract and sample rock for “strength and durability testing”. In Arctic environments, such investigations can disturb overburden and alter surface drainage patterns, particularly in thaw-sensitive terrain.

Long-term material suitability must consider freeze-thaw durability, mechanical stability, and geochemical characteristics under prolonged moisture exposure; however, while laboratory testing is referenced, the Proponent does not specify the engineering or geochemical parameters to be used (e.g., freeze–thaw loss, leachability). Likewise, no quarry-specific drainage or erosion controls are described, despite multi-season ground disturbance at four quarry sites between 2026 and 2031.

Without defined acceptance criteria and surface water management measures, uncertainty remains regarding long-term material stability and sediment transport risk during rainfall or snowmelt. CIRNAC recommends that the Proponent consider:

- Clarifying the engineering and geochemical parameters used to determine quarry material suitability;
- Demonstrating that extracted materials will remain stable under freeze–thaw and moisture exposure conditions; and
- Describing erosion and surface drainage control measures associated with quarry investigations.

CIRNAC #4: Reclamation

The field program is proposed from 2026 to 2031 and includes repeated seasonal disturbance within terrestrial, intertidal, and nearshore study areas. While drill holes will be plugged and areas cleaned following completion of activities, the Environmental Management Plan states that "reclamation is not required" and provides no objective restoration criteria or post-activity verification measures.

In Arctic terrestrial environments, vegetation recovery is slow due to short growing seasons and freeze-thaw cycling. Disturbances to tundra surfaces or temporary laydown areas can persist for multiple years without active restoration. The conclusion that reclamation is not required does not clearly reflect a cumulative multi-season disturbance assessment and does not define measurable criteria for restoration success or seasonal verification. CIRNAC recommends that the Proponent consider:

- Clarifying how terrestrial disturbance over multiple seasons will be minimized and progressively restored;
- Defining objective criteria for determining when disturbed areas are considered restored; and
- Describing whether post-activity verification will be undertaken to confirm ground stability and vegetation recovery.

CIRNAC #5: Consultation with Interested Parties

CIRNAC recommends that the Proponent consult with Nunavut Tunngavik Inc. and the Qikiqtani Inuit Association on project activities. Both organizations represent Inuit interests in the project area. As part of these consultation activities, several issues should be considered, including but not limited to:

- Incorporation of Inuit Qauijimajatuqangit and Community Knowledge in project activities;
- Mitigation measures to prevent any disturbance to wildlife and the environment;
- Mitigation measures to prevent disturbance to sites of cultural, archaeological, and/or environmental significance;
- The experience of community members who participate in traditional harvesting activities within or in close proximity to the project area;
- Training and employment opportunities for Inuit and community members;
- Procurement opportunities for local and Inuit-owned businesses; and
- Regular updates on the status of project activities.

CIRNAC appreciates the opportunity to provide comments. Should you have any questions, please contact Muhammad Arslan by e-mail at muhammad.arslan@rcaanc-cirnac.gc.ca or David Abernethy by email at david.abernethy@rcaanc-cirnac.gc.ca.

Sincerely,

Richard Bingley
Manager, Impact Assessment